



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

September 16, 2020

**BY CM/ECF**

The Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: United States v. Omar Amanat & Irfan Amanat,  
15 Cr. 536 (PGG)

Dear Judge Gardephe:

The Government writes in response to Irfan Amanat's letter of September 15, 2020. (Dkt. 1097). Upon further consideration, the Government agrees that the applicable statute governing the defendants' motions is 18 U.S.C. § 3143, not 18 U.S.C. § 3622. As set forth in the Government's letter of September 15, 2020 (Dkt. 1096), the Government opposes the defendants' motion because they remain dangers to the community and risks of flight, as do the U.S. Marshals, including because of COVID-19. Accordingly, the Court should deny the motions.

Respectfully submitted,

AUDREY STRAUSS  
Acting United States Attorney

By: \_\_\_\_\_ /s/  
Joshua A. Naftalis  
Andrea M. Griswold  
Daniel Tracer  
Assistant United States Attorneys  
(212) 637-2310/1205/2329

cc: Defense counsel (by CM/ECF)